

April 4, 2013

Ms. Rebecca Chu U.S. Environmental Protection Agency, Region 10 1200 Sixth Avenue, AWT-121 Seattle, Washington 98101

BY E-MAIL

RE: MONTHLY PROGRESS REPORT – MARCH 2013
JORGENSEN FORGE EARLY ACTION AREA – REMOVAL ACTION
IMPLEMENTATION
U.S. EPA DOCKET NO. CERCLA-10-2013-0032
SEATTLE, WASHINGTON
FARALLON PN: 831-032

Dear Ms. Chu:

Farallon Consulting, L.L.C. (Farallon) has prepared this monthly progress report on behalf of Earle M. Jorgensen Company (EMJ) to document the activities conducted during March 2013 at the Lower Duwamish Waterway Superfund Site Jorgensen Forge Early Action Area (Site) in Seattle, Washington. This monthly progress report was prepared in accordance with the requirements of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action Implementation at the Site issued by the U.S. Environmental Protection Agency (EPA), Region 10, on November 5, 2012 under EPA Docket No. CERCLA-10-2013-0032. To date, approximately 10 percent of the required work activities are complete.

SCOPE OF WORK

This monthly progress report provides:

- A summary of field activities conducted during March 2013;
- Analytical results of samples collected during March 2013;
- A summary of deliverables submitted and received during March 2013;
- A summary of technical and regulatory meetings during March 2013;
- A summary of planned activities, meetings, and deliverables for April and May 2013; and
- A summary of deviations from the AOC schedule anticipated for April and May 2013.

FIELD ACTIVITIES - MARCH 2013

No field activities were conducted during March 2013.



ANALYTICAL RESULTS – MARCH 2013

No laboratory analytical results were received during March 2013.

DELIVERABLES – MARCH 2013

The following deliverables were submitted to EPA in March 2013.

- February 2013 Monthly Progress Report dated March 15, 2013; and
- Final Basis of Design Report and Design Package dated March 25, 2012.

TECHNICAL AND REGULATORY MEETINGS - MARCH 2013

In accordance with the Memorandum of Understanding between EMJ, Jorgensen Forge Corporation (Jorgensen Forge), and The Boeing Company (Boeing), the parties participated in conference calls on March 4 and 18, 2013 to continue coordination between the adjacent sediment cleanup designs and schedule. EPA and Ecology attended the March 4 meeting to facilitate coordination between the parties and agencies. Numerous conference calls were held with EPA and the USACE to discuss EPA's comments on the Draft Final BODR and attempt to reach consensus on the associated necessary revisions to the Final BODR.

A technical meeting was held with EPA, Public Health—Seattle & King County, the Duwamish River Cleanup Coalition, and Boeing on March 28, 2013 to discuss the following:

- Removal action and anticipated implementation schedule for the Site;
- Roles and responsibilities of the Public Health agencies and EPA in the fish advisory and EPA Superfund program; and
- Existing fish advisories program to fishers and other potential ideas for notifications to fishers moving forward.

EPA communicated to the attendees that there is no regulatory requirement in the AOC that Jorgensen participate in the fish advisory program. EPA indicated that they would be willing, subject to EPA management approval, to send out mailings prior to the start of the Early Action Area cleanups at Jorgensen, Terminal 117, and Boeing this summer advising local residents of the upcoming cleanup work and the fish advisories.

PLANNED ACTIVITIES, MEETINGS, AND DELIVERABLES – APRIL AND MAY 2013 Activities

No sampling activities are proposed during April and May 2013.

Meetings

Project coordination meetings with Boeing are anticipated to occur bi-monthly during April and May 2013; and project coordination meetings with Boeing and EPA are anticipated to occur on April 15, 2013 and May 27, 2013.



Deliverables

The following deliverables will be provided to EPA during April and May 2013:

- Monthly Progress Report–April 2013 by May 15, 2013;
- Draft Community Health and Safety Plan in May 2013.
- Response to EPA comments on Final BODR and Design Package (if required) in May 2013.

DEVIATIONS FROM AOC SCHEDULE - APRIL AND MAY 2013

The 30-day EPA and stakeholder review period on the Final BODR will end on April 24, 2013. No deviations from the AOC schedule are anticipated in April and May 2013, assuming that receipt of EPA comments and/or approval of the Final BODR occurs by April 25, 2013.

CLOSING

Farallon trusts that this monthly progress report provides sufficient information for EPA. If you have questions regarding this project, please contact the undersigned at (425) 295-0800.

Sincerely,

Farallon Consulting, L.L.C.

Amy Essig Desai

Principal

cc: Mr. E. Gilbert Leon Jr., EMJ

Mr. John Gross, Jorgensen Forge Corporation

Messrs. William Joyce and Ian Sutton; Joyce Ziker Parkinson, PLLC

Messrs. Ryan Barth and David Templeton; Anchor QEA, LLC

Mr. Josh Lipsky, Cascadia Law Group, PLLC

AED:bw